

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

DENNIS L. MONTGOMERY,

Plaintiff,

v.

Civil Action No. 15-mc-00363-P1

SIMON & SCHUSTER,

and

PRISCILLA PAINTON,

and

TINA BENNETT,

Defendants.

**RESPONSE IN OPPOSITION TO  
THE MOTION FOR ADMISSION *PRO HAC VICE* OF LARRY KLAYMAN**

For the reasons set forth in their Memorandum of Law in Opposition to Plaintiff Dennis L. Montgomery's Motion to Compel, ECF No. 22, James Risen, Houghton Mifflin Harcourt Publishing Company, and Houghton Mifflin Harcourt Company, improperly sued as HMH Holdings, Inc. — each a defendant in the action *Montgomery v. Risen*, No. 15-cv-20782-JEM (S.D. Fla. filed Feb. 24, 2015) — oppose the Motion for Admission *Pro Hac Vice* of Larry Klayman, ECF Nos. 24, 27, who seeks to appear for Plaintiff in this proceeding.<sup>1</sup> Raymond Negron, Esq. has already appeared for Plaintiff and has filed the Motion to Compel on his behalf.

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<sup>1</sup> “Although *pro hac vice* admissions are routinely granted, the Court's decision to do so is not simply a *pro forma* exercise, and there are occasions where such applications have been denied.” *Sedona Corp. v. Ladenburg Thalmann & Co.*, 2003 WL 22339357, at \*3 (S.D.N.Y. Oct. 14, 2003).

November 27, 2015

Respectfully submitted,

/s/ Laura R. Handman

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**CERTIFICATE OF SERVICE**

I certify that on November 27, 2015, I served the foregoing Response in Opposition to the Motion for Admission *Pro Hac Vice* of Larry Klayman on the Clerk of the Court and counsel of record by ECF.

/s/ Laura R. Handman

Laura R. Handman